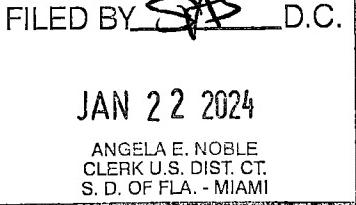


EXHIBIT 8

MEMORANDUM IN SUPPORT OF JOINED RULE 12 MOTIONS:

MOTION FOR MORE DEFINITE STATEMENT; MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND INSUFFICIENT PROCESS, ON THE GROUNDS THAT CLAIMS MUST BE ARBITRATED, AND FAILURE TO STATE A CLAIM; AND MOTION TO STRIKE;

AND IN THE ALTERNATIVE, MOTION TO STAY THE PROCEEDINGS



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CONSUMER FINANCIAL PROTECTION BUREAU,
THE PEOPLE OF THE STATE OF NEW YORK, BY
LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK, STATE OF COLORADO, ex
rel. PHILIP J. WEISER, ATTORNEY GENERAL,
STATE OF DELAWARE, ex rel. KATHLEEN
JENNINGS, ATTORNEY GENERAL, STATE OF
DELAWARE, THE PEOPLE OF THE STATE OF
ILLINOIS, through ATTORNEY GENERAL KWAME
RAOUL, THE STATE OF MINNESOTA, by its
ATTORNEY GENERAL, KEITH ELLISON, THE
STATE OF NORTH CAROLINA, ex rel. JOSHUA H.
STEIN, ATTORNEY GENERAL, THE STATE OF
WISCONSIN,

Plaintiffs,

v.

STRATFS, LLC (F/K/A STRATEGIC FINANCIAL
SOLUTIONS, LLC), STRATEGIC CLIENT SUPPORT,
LLC (F/K/A PIONEER CLIENT SERVICES, LLC),
STRATEGIC CS, LLC, STRATEGIC FS BUFFALO,
LLC, STRATEGIC NYC, LLC, BCF CAPITAL, LLC,
T FIN, LLC, STRATEGIC CONSULTING, LLC,
VERSARA LENDING, LLC, STRATEGIC FAMILY,
INC., ANCHOR CLIENT SERVICES, LLC (NOW
KNOWN AS CS 1 PAAS SERVICES, LLC),
BEDROCK CLIENT SERVICES, LLC, BOULDER
CLIENT SERVICES, LLC, CANYON CLIENT
SERVICES, LLC, CAROLINA CLIENT SERVICES,
LLC, GREAT LAKES CLIENT SERVICES, LLC,
GUIDESTONE CLIENT SERVICES, LLC, HARBOR
CLIENT SERVICES, LLC, HEARTLAND CLIENT
SERVICES, LLC, MONARCH CLIENT SERVICES,
LLC (NOW KNOWN AS CS 2 PAAS SERVICES,
LLC), NEWPORT CLIENT SERVICES, LLC,
NORTHSTAR CLIENT SERVICES, LLC, OPTION 1
CLIENT SERVICES, LLC, PIONEER CLIENT
SERVICING, LLC, ROCKWELL CLIENT SERVICES,
LLC, ROYAL CLIENT SERVICES, LLC,
STONEPOINT CLIENT SERVICES, LLC, SUMMIT
CLIENT SERVICES, LLC (NOW KNOWN AS CS 3
PAAS SERVICES, LLC), WHITESTONE CLIENT
SERVICES, LLC, RYAN SASSON, JASON BLUST,
and UNIDENTIFIED JOHN DOES 1-50,

Defendants, and

Misc. Case No.

**NOTICE OF ORDER
APPOINTING RECEIVER
PURSUANT TO 28 U.S.C. § 754**

United States District Court
Western District of New York
Case No. 1:24-cv-00040-JLS-MJR

[REDACTED]

DANIEL BLUMKIN, ALBERT IAN BEHAR,
STRATEGIC ESOP, STRATEGIC ESOT, TWIST
FINANCIAL, LLC, DUKE ENTERPRISES, LLC,
BLAISE INVESTMENTS, LLC, THE BLUST FAMILY
IRREVOCABLE TRUST THROUGH DONALD J.
HOLMGREN, TRUSTEE, JACLYN BLUST, LIT DEF
STRATEGIES, LLC, and RELIALIT, LLC,

Relief Defendants.

**NOTICE OF ORDER APPOINTING RECEIVER
PURSUANT TO 28 U.S.C. § 754**

United States District Court
Western District of New York
Case No. 1:24-cv-00040-JLS-MJR

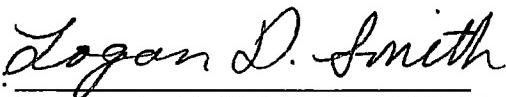
[REDACTED]

On January 10, 2024, the Consumer Financial Protection Bureau, the People of the State of New York, by Letitia James, Attorney General of the State of New York, State of Colorado, *ex rel.* Philip J. Weiser, Attorney General, State of Delaware, *ex rel.* Kathleen Jennings, Attorney General, State of Delaware, the People of the State of Illinois, through Attorney General Kwame Raoul, the State of Minnesota, by its Attorney General, Keith Ellison, the State of North Carolina, *ex rel.* Joshua H. Stein, and Attorney General, the State of Wisconsin, filed a Complaint for Injunctive Relief, Restitution, and Civil Money Penalties in the United States District Court for the Western District of New York, Case No. 1:24-cv-00040-JLS-MJR.

Attached hereto as Exhibit A is a true and correct copy of the Complaint (*which still remains under seal*). Court-Appointed receiver, Thomas W. McNamara (“Receiver”), by and through the undersigned counsel, hereby provides notice, pursuant to 28 U.S.C. § 754, that on January 11, 2024, the Court entered an *Ex Parte* Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief (“TRO”), appointing Mr. McNamara as Receiver over the Receivership Defendants (TRO, Section VIII, pages 18-19). A true and correct copy of the TRO is attached hereto as Exhibit B.

Respectfully submitted this 18th day of January, 2024.

MCNAMARA SMITH LLP

By: 

Logan D. Smith (Cal. Bar No. 212041)
McNamara Smith LLP
655 West Broadway, Suite 900
San Diego, California 92101
Tel.: 619-269-0400
lsmith@mnamarallp.com

*Attorneys for Court-appointed Receiver,
Thomas W. McNamara*